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**From:** Tobias, David [Tobias.David@epa.gov]  
**Sent:** 12/15/2020 2:02:35 PM  
**To:** Schechter, Kathryn [Schechter.Kathryn@epa.gov]  
**Subject:** RE: Definition of PFAS in the data call in rule

Defining chemical class is hard.

## Ex. 5 Deliberative Process (DP)

David Tobias

Currently on detail in Chemical Risk and Reporting Enforcement Branch/WCED/OCE/OECA

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**From:** Schechter, Kathryn <Schechter.Kathryn@epa.gov>  
**Sent:** Monday, December 14, 2020 8:54 AM  
**To:** Tobias, David <Tobias.David@epa.gov>  
**Subject:** RE: Definition of PFAS in the data call in rule

There were a couple of thoughts that went into this decision. Of course, the inclusion of such chemicals is still possible. We asked for comments on this...

## Ex. 5 Deliberative Process (DP)

Kathy (your thoughts are always welcome!)

Dr. Kathy Schechter  
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**From:** Tobias, David <Tobias.David@epa.gov>  
**Sent:** Friday, December 11, 2020 9:26 AM  
**To:** Schechter, Kathryn <Schechter.Kathryn@epa.gov>  
**Subject:** Definition of PFAS in the data call in rule

Good morning Kathy

“

For the purposes of this proposed action, the structural definition of PFAS includes per- and polyfluorinated substances that structurally contain the unit  $R-(CF_2)-C(F)(R')R''$ . Both the  $CF_2$  and  $CF$  moieties are saturated carbons and none of the  $R$  groups ( $R$ ,  $R'$  or  $R''$ ) can be hydrogen.

“

I was wondering whether  $R-[(CF_2)-O]_n-R$  would fall in the data call in rule? It seems like perfluoro ethers like this wouldn't, which surprised me when I thought more about this definition. I think there are chemicals with the  $CF_2-O$  repeat group, why wouldn't we want them to be part of the rule?

Thanks

David Tobias

Currently on detail in Chemical Risk and Reporting Enforcement Branch/WCED/OCE/OECA